



mwe.com

Kerry Alan Scanlon
Head of U.S. Labor & Employment
Litigation Practice
Kscanlon@mwe.com
+1 202 756 8696

October 11, 2024

VIA ECF

The Honorable Margaret M. Garnett
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Venessa Dobney v. The Walt Disney Company, et al*, Civil Action No. 1:23-cv-05380-MMG
Joint Motion for a Stay Pending Mediation with a Private Mediator

Dear Judge Garnett,

Defendants The Walt Disney Company, American Broadcasting Companies, Inc., Elizabeth Barrett, and Richard McHale (collectively, “defendants”) and plaintiff Venessa Dobney, write pursuant to Your Honor’s Individual Practices I.B.5. to respectfully request that the Court stay these proceedings to allow the parties to attempt to resolve their dispute through private mediation. In further support of this letter-motion, the parties state as follows:

1. The parties request this stay so that they can attempt to amicably resolve this dispute through mediation with a private mediator. The mediator they have agreed on is Stephen P. Sonnenberg.
2. The current deadline for fact discovery is October 18, 2024. A conference regarding summary judgment letters is currently scheduled for November 14, 2024. The expert discovery deadline is January 6, 2025.
3. There have been two previous requests for extension of time—one related to the briefing schedule for defendants’ motion to dismiss and the other relating to defendants’ time to answer the complaint.
4. All parties consent to this motion.
5. If the parties are unable to reach a resolution through mediation, the parties will so advise the Court and propose a new schedule for the remainder of the case.

GRANTED. All dates and deadlines are hereby **STAYED** pending the parties' private mediation. The November 14, 2024 post-fact discovery conference is hereby **ADJOURNED *sine die***. The parties are hereby **ORDERED** to submit a status report to the Court by the earlier of the following dates: (1) seven days after the conclusion of their private mediation, or (2) **December 12, 2024**.

SO ORDERED. Dated October 11, 2024.

HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE

fully,

an Scanlon

001-1531 Tel +1 202 756 8000 Fax +1 202 756 8087
nery LLP.